

To: Robin, George[Robin.George@epa.gov]
From: George Robin
Sent: Tue 4/15/2014 3:57:51 PM
Subject: Fw: (AERA CEQA Document & Request for Comments)(Meeting relevant issues)(Alon Refinery included)Aera-South Belridge Aquifer Exemption and Injection Project Application
CII Water Disposal SBel Field IS.MND 6.27.11.doc

----- Forwarded by George Robin/R9/USEPA/US on 04/15/2014 08:57 AM -----

From: George Robin/R9/USEPA/US
To: "Shih, Tian-Ting" <Tian-Ting.Shih@conservation.ca.gov>,
Cc: "Wermiel, Dan" <Dan.Wermiel@conservation.ca.gov>, "Miller, Elena" <Elena.Miller@conservation.ca.gov>, "Habel, Rob" <Rob.Habel@conservation.ca.gov>, David Albright/R9/USEPA/US@EPA, R9-Deep
Date: 08/29/2011 11:14 AM
Subject: RE: (AERA CEQA Document & Request for Comments)(Meeting relevant issues)(Alon Refinery included)Aera-South Belridge Aquifer Exemption and Injection Project Application

Hi Tian,

Thank you for the request for comments and for this electronic form of the Aera submittal. We look forward to discuss comments, etc. in detail at your and your agency's convenience.

Please let me know if you have any questions - either specifically regarding this project or Aquifer Exemptions in general.

George Robin
415-972-3532

☞ "Shih, Tian-Ting" ---08/29/2011 10:54:21 AM---George,

From: "Shih, Tian-Ting" <Tian-Ting.Shih@conservation.ca.gov>
To: George Robin/R9/USEPA/US@EPA
Cc: "Miller, Elena" <Elena.Miller@conservation.ca.gov>, "Wermiel, Dan" <Dan.Wermiel@conservation.ca.gov>, "Habel, Rob" <Rob.Habel@conservation.ca.gov>
Date: 08/29/2011 10:54 AM
Subject: RE: (Meeting relevant issues)(Alon Refinery included)Aera-South Belridge Aquifer Exemption and Injection Project Application

George,

I am attaching the CEQA document submitted by Aera regarding this water disposal projects just in case you do not have it yet. Please let me know if you have any comments on this document. Thanks.

Tian

Tian-Ting Shih, Ph.D.
Environmental Program Manager
California Department of Conservation
Division of Oil, Gas, and Geothermal Resources
801 K Street, MS 20-20

Sacramento, CA 95814
Tel: (916)324-6641
Fax: (916) 323-0424

From: Miller, Elena
Sent: Monday, August 29, 2011 10:40 AM
To: 'Robin.George@epamail.epa.gov'; Wermiel, Dan
Cc: Habel, Rob; Shih, Tian-Ting; Albright.David@epamail.epa.gov; R9-Deep@epamail.epa.gov
Subject: RE: (Meeting relevant issues)(Alon Refinery included)Aera-South Belridge Aquifer Exemption and Injection Project Application

Good morning.

The original email below by Aera (Ron Chambers) addresses the Class II Water Disposal Project and Aquifer Exemption-South Belridge Field CEQA document that Aera has pending with DOGGR. The CEQA draft document is under review in Sacramento by our environmental unit and does not at this time require the resources of UIC engineers in Bakersfield or Sacramento. Dr. Tian-Ting Shih's environmental team have been working with Aera and/or its consultant(s) on the document. Discussions concerning mitigation measures that may need to be addressed in the CEQA document to satisfy the RWQCB will be handled by Dr. Shih's team. The most recent draft was submitted to DOGGR by Aera in July as a Negative Declaration.

Regards,

Elena M. Miller
State Oil & Gas Supervisor
Department of Conservation
Division of Oil, Gas & Geothermal Resources
(916) 323-1782
(916) 323-0424 facsimile

From: Robin.George@epamail.epa.gov [<mailto:Robin.George@epamail.epa.gov>]
Sent: Monday, August 29, 2011 10:16 AM
To: Wermiel, Dan
Cc: Miller, Elena; Habel, Rob; Shih, Tian-Ting; Albright.David@epamail.epa.gov; R9-Deep@epamail.epa.gov
Subject: RE: (Meeting relevant issues)(Alon Refinery included)Aera-South Belridge Aquifer Exemption and Injection Project Application

Thanks Dan, please respond appropriately to Ron Chamber's original request to you.

George Robin
415-972-3532

From: "Wermiel, Dan" <Dan.Wermiel@conservation.ca.gov>

To: George Robin/R9/USEPA/US@EPA
Cc: "Miller, Elena" <Elena.Miller@conservation.ca.gov>, "Habel, Rob" <Rob.Habel@conservation.ca.gov>, "Shih, Tian-Ting" <Tian-Ting.Shih@conservation.ca.gov>
Date: 08/29/2011 09:31 AM
Subject: RE: (Meeting relevant issues)(Alon Refinery included)Aera-South Belridge Aquifer Exemption and Injection Project Application

Hello. I want to inform you that I have communicated with DOGGR management and will decline to meet here in D4 with you or the various others mentioned. Instead, the aquifer exemption, including the CEQA document, and additional matters of interest will be subjects for discussion between EPA and with DOGGR management in Sacramento.

Please finalize tour travel arrangements without the commitment for this meeting.

Thanks - Dan

Dan E. Wermiel
(661) 334-3651 (wk)

From: Robin.George@epamail.epa.gov [<mailto:Robin.George@epamail.epa.gov>]
Sent: Friday, August 26, 2011 11:47 AM
To: Wermiel, Dan
Cc: Habel, Rob; Kustic, Tim; Albright.David@epamail.epa.gov; R9-Deep@epamail.epa.gov
Subject: RE: (Meeting relevant issues)(Alon Refinery included)Aera-South Belridge Aquifer Exemption and Injection Project Application

Hi Dan,

You asked if I have any specific questions. There are a number of issues more than questions. Here are a few:

- I will be in the Bakersfield area that week and certainly, it makes program sense that as a professional courtesy I touch base with the DOGGR about this trip and other UIC matters. This aspect of agency-to-agency cooperation, collaboration has proven beneficial. Incidentally, I always keep Friday open for such impromptu meetings with your District whenever I make my annual trip witnessing FOTs, MITs and UIC permit related determinations with the operators in the area. In addition to "meetings," in a cooperative spirit, I always notify the DOGGR of my week's plans so that the District staff can choose to accompany me at locations of professional UIC related interest to enhance their technical experience - and mine. Consequently my return trip to San Francisco has often taken place on the following Saturday instead of those Fridays.
- To my knowledge this will be your first Aquifer Exemption undertaking. Our meeting can, more than anything else visit the procedural protocol that makes this process work.
- I spoke with Aera's representative Ron Chambers per this email's history when he called me and I agreed to his offer to arrange to meet at your office if such a meeting

can be arranged successfully. I pointed out that I always keep Friday open for such impromptu meetings whenever I make my annual witnessing of FOTs, MITs and UIC permit related determinations with the operators in the area. In our conversation, I stressed this meeting (referring to this particular aspect of such a meeting with Aera present - we can also meet without Aera being present) will not be decisional, but informative so that the technical aspects are described and better understood by the main affected agencies - the Regional Board, the EPA Region 9 and the DOGGR. In turn, the "Aquifer Exemption process" from the Federal UIC Regulatory position can be described and hopefully well understood by those present. In fact, while the Federal position does not dictate the DOGGR's process, the process that EPA Region 9 and DOGGR have ultimately adopted seems to compliment it because, programatically it makes sense.

- Also please note that you will soon be receiving via email a DRAFT UIC permit for Alon Refinery. Besides the informational aspect of the email, you are requested to provide any comments, questions, etc. so that I can incorporate them into that permit. I will be meeting with Alon reps and consultants on the Monday afternoon Sept. 19th upon my arrival in Bakersfield. You and I recently discussed this case. You are welcome and invited to attend this Monday meeting. For you and the DOGGR, it should be quite informative. It shall be decisional in nature. Of course, this is another issue we can efficiently discuss if we meet that following Friday because you will surely have questions in reference to the DOGGR's and the Regional Board's present and historical involvement in this refinery's UIC permitted regulation.
- I am actually more interested in your specific questions and issues. A physical meeting will help to clarify and resolve to address all of them. Please consider my offer to meet under the conditions most beneficial to your District. I specifically emphasize that offer includes any such meeting with or without Aera or the Regional Board or Alon, for that matter. Let's please resolve this so that I can finalize my travel reservations and arrangements.

George

415-972-3532 ofc

-----"Wermiel, Dan" <Dan.Wermiel@conservation.ca.gov> wrote: -----

To: George Robin/R9/USEPA/US@EPA

From: "Wermiel, Dan" <Dan.Wermiel@conservation.ca.gov>

Date: 08/24/2011 02:26PM

Cc: "Kustic, Tim" <Tim.Kustic@conservation.ca.gov>, "Habel, Rob" <Rob.Habel@conservation.ca.gov>

Subject: RE: Aera-South Belridge Aquifer Exemption and Injection Project Application

Let me check further regarding this and to get a better understanding of where we are in the this review. Do you have specific questions about this that need to be addressed?

Thanks – Dan

From: Robin.George@epamail.epa.gov [<mailto:Robin.George@epamail.epa.gov>]

Sent: Tuesday, August 23, 2011 1:10 PM

To: Wermiel, Dan

Cc: Ellison, Burt; Wachtell, Doug - RWQCB; Salera, Jerry; Johnson, Michael; Glinzak, Mike; Chambers RL (Ron) at Aera; Habel, Rob; Gray, Shelton - RWQCB; Shih, Tian-Ting; Kustic, Tim; Albright.David@epamail.epa.gov; R9-Deep@epamail.epa.gov
Subject: RE: Aera-South Belridge Aquifer Exemption and Injection Project Application

Dan,

I am open for scheduling this meeting. I will already be in town, so the preference goes to those who are driving from farthest away.

George

From: "Wermiel, Dan" <Dan.Wermiel@conservation.ca.gov>
To: "Chambers RL (Ron) at Aera" <RLChambers@aeraenergy.com>, "Salera, Jerry" <Jerry.Salera@conservation.ca.gov>, "Gray, Shelton - RWQCB" <sgray@waterboards.ca.gov>, "Wachtell, Doug - RWQCB" <dwachtell@waterboards.ca.gov>, George Robin/R9/USEPA/US@EPA, "Ellison, Burt" <Burt.Ellison@conservation.ca.gov>, "Glinzak, Mike" <Mike.Glinzak@conservation.ca.gov>, "Shih, Tian-Ting" <Tian-Ting.Shih@conservation.ca.gov>, "Habel, Rob" <Rob.Habel@conservation.ca.gov>, "Kustic, Tim" <Tim.Kustic@conservation.ca.gov>, "Johnson, Michael" <Michael.Johnson@conservation.ca.gov>
Date: 08/18/2011 03:41 PM
Subject: RE: Aera-South Belridge Aquifer Exemption and Injection Project Application

Hello to all. I am available and will have the conference room in D4 reserved for this meeting. Please let me know what time George wants to hold the meeting.

Thanks – Dan

From: Chambers RL (Ron) at Aera [<mailto:RLChambers@aeraenergy.com>]
Sent: Thursday, August 18, 2011 2:32 PM
To: Salera, Jerry; Wermiel, Dan; Gray, Shelton - RWQCB; Wachtell, Doug - RWQCB; Robin, George - US EPA
Subject: Aera-South Belridge Aquifer Exemption and Injection Project Application

Gentlemen,

I was speaking to George Robin of EPA Region IX today and he is available to discuss the process for moving Aera's aquifer exemption request through the EPA approval process on Friday September 23rd at the Bakersfield DOGGR office. By now many of you have received copies of the CEQA document that Aera prepared in support of the aquifer exemption and injection project along with the project description and AOR conducted by Division 4 staff. If time permits we can also discuss the mitigation measures and project monitoring obligations that Aera has made since RWQCB provided their initial comments in March of 2009 and Aera's successful sampling of the native groundwater in the Tulare Mid-Pay Above A zone in July of 2010.

Please reply at your earliest convenience.

Thank you,

Ron Chambers

R.L. Chambers
Aera Energy LLC
P.O. Box 11164
Bakersfield, CA 93389-1164
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(See attached file: CII Water Disposal _SBel Field IS.MND 6.27.11.doc)